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KEVIN STOCK
COUNTY CLERK
NO: 20-2-04955-2

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTY**

TINA BROVOLD, an individual,

Plaintiff,

vs.

SAFEWAY, INC., a foreign profit
corporation,

Defendant.

Case No.

**COMPLAINT FOR PERSONAL
INJURY**

COMES NOW Plaintiff, Tina Brovold, by and through her attorneys of record, Richard
S. Aguire and Kevin B. Page of Ritchie Reiersen, PLLC, and hereby alleges the following:

I. PARTIES

1.1 Plaintiff, Tina Brovold, resides in Pierce County, Washington.

1.2 Defendant Safeway, Inc., is a foreign, for-profit, business in Pierce County,
Washington.

II. JURISDICTION/ VENUE

2.1 This Court has jurisdiction pursuant to Article 4 of the Washington State
Constitution and RCW 2.08.010.

Complaint
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1 2.2 Venue is proper pursuant to RCW 4.12.020(3) because this is an action for recovery
2 of damages for injuries, the cause of which occurred within Pierce County, Washington.

3 **III. BACKGROUND/FACTS**

4 3.1 On or about March 8, 2017, plaintiff was shopping at the Safeway Store located at
5 1624 72nd Street East in Tacoma, Pierce County, Washington.

6 3.2 While exercising due care for her own safety, plaintiff took a step back from the
7 lottery ticket vending machine to allow another shopper to pass by with a shopping cart.

8 3.3 Plaintiff then slipped on a clear liquid substance.

9 3.4 There were no signs indicating a wet floor in the area where Plaintiff fell.

10 3.5 The slippery floor caused Plaintiff to fall and sustain injury.

11 **IV. DUTY AND BREACH**

12 4.1 Defendant Safeway, Inc., had a duty to maintain the aisles and floors of its store
13 in a reasonably safe condition which did not pose a risk of injury to business invitees.

14 4.2 Defendant Safeway, Inc., breached this duty and was negligent in that it failed to
15 properly maintain the aisles and floors in a reasonably safe condition.

16 4.3 Defendant Safeway, Inc., breached this duty and was negligent in that it knew, or
17 should have known of the dangerous condition or to notify or warn business invitees of the
18 unreasonably dangerous condition caused by the liquid substance on the floor.

19 **V. DAMAGES**

20 5.1 As a direct and proximate result of defendant's breach of duty, plaintiff has
21 suffered personal injuries the extent of which are not now known but will be proven at trial.

22 5.2 As a direct and proximate result of defendant's breach of duty, plaintiff has
23 incurred reasonable and necessary medical expenses.

1 5.3 As a direct and proximate result of defendant's breach of duty, plaintiff has
2 incurred injuries, pain, suffering, and anguish.

3 5.4 As a direct and proximate result of defendant's breach of duty, plaintiff will suffer
4 future medical expenses and future pain and suffering.

5 5.5 As a direct and proximate result of defendant's breach of duty, plaintiff has
6 sustained wage loss.

7 5.6 As a direct and proximate result of defendant's breach of duty, plaintiff has
8 incurred such other damages as will be proven at trial.
9

10 **VI. PRAYER FOR RELIEF**

11 Plaintiff prays judgment against the Defendants as follows:

12 6.1 For economic damages in an amount to be determined at trial;

13 6.2 For non-economic damages in an amount to be determined at trial;

14 6.3 For statutory attorney's fees and costs; and

15 6.4 For all other relief the Court deems just and equitable.

16 DATED this 14th day of February 2020.

17 RITCHIE REIERSEN, PLLC
18

19 By: 
20

21 **RICHARD S. AGUIRE, WSBA #49534**

22 **KEVIN B. PAGE, WSBA #49585**

23 Attorneys for Plaintiff
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